

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA
(MIAMI DIVISION)**

JANE DOE,

CASE NO: 1:25-cv-20757-JB/Torres

Plaintiff,

v.

STEVEN K. BONNELL II,

Defendant.

PLAINTIFF'S MOTION FOR LEAVE TO FILE UNDER SEAL UNREDACTED
VERSION OF MOTION FOR ORDER TO SHOW CAUSE

Pursuant to Local Rule 5.4(b)(1) of the Southern District of Florida and 15 U.S.C. §6851, Plaintiff Jane Doe, by and through her undersigned counsel, respectfully moves this Court for leave to file under seal the unredacted version of Plaintiff's Motion for Order to Show Cause Why Defendant Should Not Be Held in Contempt and Request for Sanctions and Injunctive Relief. In support of this good cause motion, Plaintiff states as follows:

1. On this same date, Plaintiff has filed a Motion for Order to Show Cause Why Defendant Should Not Be Held in Contempt and Request for Sanctions and Injunctive Relief ("Motion"). The Motion pertains to Defendant's violation of the Court's Order sealing the transcript of the preliminary injunction hearing ("Sealing Order") (ECF 91).

2. The Motion sets forth the following evidence of Defendant's violation: i) excerpts of the transcript of Defendant's livestream in which he read the hearing transcript out loud, and then showed it to his fellow live streamer; ii) links to the livestream video; and iii) a link to the reposting of the video on a social media site.

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3. In accordance with the Sealing Order and Local Rule 5.4(b)(1), Plaintiff redacted the evidence set forth in the Motion. The evidence was necessarily redacted in order to abide by the Sealing Order since it contains Defendant's verbatim recitation of the sealed transcript. Plaintiff now moves to file the unredacted version of the Motion under seal.

4. Plaintiff requests that the seal remain in place for the duration of the litigation, including any appeals, to ensure the Court's Sealing Order is not violated. This duration is also consistent with the need to prevent further emotional and psychological harm to Plaintiff, as supported by *Doe Williams v. Williams*, 2024 U.S. Dist. (S.D. Miss. May 31, 2024), which noted that §6851's purpose is to protect against the publicization of intimate matters.

5. The Eleventh Circuit recognizes a "presumptive common law right to inspect and copy judicial records," but this right is not absolute and may be overcome by a showing of good cause. *Romero v. Drummond Co.*, 480 F.3d 1234, 1245-46 (11th Cir. 2007). Courts balance the public's right of access against the party's interest in confidentiality, considering factors such as "whether allowing access would impair court functions or harm legitimate privacy interests, the degree of and likelihood of injury if made public, ... and the availability of a less onerous alternative to sealing the documents." *Romero*, 480 F.3d at 1246; *See Jankula v. Carnival Corp.*, 2019 WL 8051719 at *2 (S.D. Fla. September 5, 2019).

6. In the instant case, good cause for sealing the unredacted Motion is unequivocally established since otherwise the filing would violate the Court's Sealing Order. In accordance with Administrative Order 2018-71 and the CM/ECF Administrative Procedures of the Southern District of Florida, attached hereto as **Exhibit A** is a proposed order granting this motion.

7. The person authorized to retrieve any sealed, tangible items is: Carlos A. Garcia Perez Sanchez-Medina, Gonzalez, Quesada, Lage, Gomez & Machado, LLP 201 Alhambra Circle,

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WHEREFORE, Plaintiff respectfully requests that this Court grant leave to file the unredacted versions of Plaintiff's Motion under seal, to remain sealed for the duration of the litigation, including any appeals, and enter an order directing the Clerk to maintain the Motion under seal.

Respectfully submitted,

Dated: August 21, 2025.

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Counsels for Plaintiff JANE DOE



By: _____

CARLOS A. GARCIA PEREZ

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on August 21, 2025 a true and correct copy of the foregoing was served on all parties via the CM/ECF filing portal to all counsel of record.



By: _____

CARLOS A. GARCIA PEREZ

Attorney for Plaintiff